

Donna Grier August 22, 2023 Deposition Designations																	
Affirmative Designation				Objections		Counter-Designations				Objections to Counter-Designations		Reply Designations				Objections to Reply Designations	
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11	11	12	1			34	23	34	25	Non-responsive to designation							
14	12	15	23			35	2	35	4	Non-responsive to designation							
16	1	20	7			41	19	41	21	Non-responsive to designation							
22	10	22	22			42	21	43	6	Non-responsive to designation; hearsay							
25	14	26	24			43	14	43	17	Non-responsive to designation; incomplete designation; hearsay							
27	4	27	10			43	19	44	2	Non-responsive to designation; incomplete designation; hearsay							
28	10	28	25			71	17	71	20	Non-responsive to designation; relevance							
29	9	30	16			83	7	83	13	Non-responsive to designation							
30	20	31	5			96	3	96	11	Non-responsive to designation							
32	10	32	20			97	23	98	1	Non-responsive to designation							
33	2	33	15	Foundation		98	8	98	20	Non-responsive to designation; hearsay	98	21	99	10	Foundation		
33	18	34	22	Foundation		99	8	99	10	Non-responsive to designation							
35	6	36	19	Foundation		102	25	103	3	Non-responsive to designation; incomplete designation							
37	5	39	10			103	5	103	10	Non-responsive to designation; incomplete designation							
41	6	41	18			107	7	107	10	Non-responsive to designation							
42	5	42	20			107	18	107	19	Non-responsive to designation							
45	3	46	12			108	2	108	9	Non-responsive to designation; relevance							
48	12	49	5			108	10	108	14	Non-responsive to designation; relevance							
49	16	49	21			115	13	115	16	Non-responsive to designation; foundation; lack of personal knowledge							
51	15	53	9			122	18	123	2	Non-responsive to designation; lack of personal knowledge							
54	3	55	8			127	11	128	4	Non-responsive to designation; lack of personal knowledge							
55	16	56	8			128	5	128	14	Non-responsive to designation; lack of personal knowledge							
56	11	63	16			131	17	132	2	Non-responsive to designation							
64	20	71	10	65:18-71:10 Relevance - DowDuPont		147	4	148	21	Non-responsive to designation	148	22	150	19	Foundation		
71	21	72	12			153	19	153	20	Non-responsive to designation							

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73	6	77	21			153	21	153	23	Non-responsive to designation; incomplete designation							
78	11	79	12	79:10-79:12 Relevance - DowDuPont		153	25	154	1	Non-responsive to designation; incomplete designation							
79	24	80	16			156	11	156	14	Non-responsive to designation; incomplete designation							
80	25	81	17			156	16	156	19	Non-responsive to designation; incomplete designation							
83	1	83	6	83:4-83:6 Foundation		173	11	173	12	Non-responsive to designation; incomplete designation	175	8	175	16			
83	14	85	17			183	1	183	11	Non-responsive to designation							
86	3	93	20			198	5	198	7	Non-responsive to designation							
93	25	96	2			219	15	219	17	Non-responsive to designation							
96	19	97	7			223	11	223	11	Non-responsive to designation; incomplete designation							
99	11	100	11			230	5	230	7	Non-responsive to designation							
101	20	101	24			232	4	233	2	Non-responsive to designation							
102	10	102	24			234	16	235	2	Non-responsive to designation							
103	12	103	15			237	4	237	8	Non-responsive to designation; incomplete designation	237	23	238	5			
103	24	107	6	106:14-107:6 Foundation		237	10	237	22	Non-responsive to designation; incomplete designation	237	23	238	5			
107	11	107	19			253	19	253	24	Non-responsive to designation							
108	15	112	1	Foundation		255	21	255	24	Non-responsive to designation							
112	9	112	23			257	9	257	13	Non-responsive to designation							
114	22	115	12	Foundation		260	2	260	3	Non-responsive to designation							
115	25	119	15	Foundation		272	23	273	5	Non-responsive to designation							
121	16	122	17	Foundation		293	10	293	13	Non-responsive to designation							
123	5	123	20	Foundation		293	19	293	21	Non-responsive to designation							
123	25	124	25			294	1	294	19	Non-responsive to designation; hearsay	294	20	294	24	Foundation		
125	10	127	10			294	25	295	5	Non-responsive to designation							
128	15	130	9														
130	10	131	16														
132	3	132	6														
132	19	133	5														
136	3	136	20														
138	15	140	24														
141	18	143	22														

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149	8	150	16														
151	23	153	18														
154	3	155	8														
155	20	156	10														
157	12	158	16														
167	20	170	13														
171	6	172	5														
173	1	173	8														
175	20	177	8														
179	7	179	10														
179	17	182	25														
183	12	184	7														
184	17	185	19	Foundation													
186	1	187	2	Foundation													
188	19	190	12	Foundation													
190	15	192	24														
193	12	194	10														
195	4	198	3														
198	19	202	16														
203	22	204	1														
204	11	204	22														
205	5	205	10														
212	13	212	16														
212	20	213	4														
213	11	213	15														
214	7	217	19														
218	1	219	14														
219	18	220	18														
220	21	223	10	223:5-223:9 Foundation; speculation													
224	14	225	25	225:2-225:15 Foundation; speculation													
229	10	230	4														
230	21	232	3														
233	16	234	15														
238	7	241	17														
247	11	247	16														
248	3	248	7														
248	14	249	16														
251	2	253	19														
253	25	255	13														

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257	14	258	3														
259	18	259	25	259:23-260:3 Foundation													
260	5	260	21	Relevance - post spin-off occurrences irrelevant to solvency at the time of the spin-off													
260	24	261	7	Relevance - post spin-off occurrences irrelevant to solvency at the time of the spin-off													
262	8	262	15	Relevance - post spin-off occurrences irrelevant to solvency at the time of the spin-off; foundation													
263	4	264	11	Relevance - post spin-off occurrences irrelevant to solvency at the time of the spin-off													
264	20	266	13	Relevance - post spin-off occurrences irrelevant to solvency at the time of the spin-off													
266	16	269	10	Relevance - post spin-off occurrences irrelevant to solvency at the time of the spin-off													
269	13	269	25	Relevance - post spin-off occurrences irrelevant to solvency at the time of the spin-off													
272	1	272	17	Relevance - post spin-off occurrences irrelevant to solvency at the time of the spin-off													
273	6	273	16														
275	6	276	4	Relevance													

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9	2	9	5			15	15	15	16								
12	14	12	15			16	2	17	15								
14	16	15	5			18	20	19	4								
19	23	24	3	24:1-24:3 Relevance		36	3	36	6	Non-responsive to designation							
24	25	25	6	Relevance		36	11	36	17	Non-responsive to designation; lack of personal knowledge							
25	15	25	20			79	12	79	14	Non-responsive to designation							
26	11	26	19	Relevance; foundation; lack of personal knowledge; hearsay		102	20	102	23	Non-responsive to designation; incomplete counter-designation							
27	1	27	9	27:1-27:4 Relevance, foundation, lack of personal knowledge, hearsay; 27:5-27:9 Relevance, foundation, lack of personal knowledge		102	25	103	3	Non-responsive to designation; incomplete counter-designation							
29	6	30	4			105	14	105	19	Non-responsive to designation; lack of personal knowledge; speculation							
31	4	33	11	31:4-31:7 Lack of personal knowledge; 31:11-31:18 Lack of personal knowledge, speculation [second obj. is not part of designation]		129	2	129	5	Non-responsive to designation							
33	21	34	14			161	7	161	8	Non-responsive to designation							
34	19	35	21			161	11	161	19	Non-responsive to designation							
36	24	37	12			162	16	162	20	Non-responsive to designation							
39	7	40	3	39:25-40:3 Lack of personal knowledge		162	23	163	7	Non-responsive to designation							
45	10	45	19	Lack of personal knowledge; lack of foundation		164	14	164	17	Incomplete counter-designation; non-responsive to designation; foundation; lack of personal knowledge; impermissible opinion testimony							
49	15	49	25			164	19	164	22	Incomplete counter-designation; non-responsive to designation; foundation; lack of personal knowledge; impermissible opinion testimony	142	8	142	19			
48	3	51	10	Improper designation - relevant exhibit not designated; lack of foundation		164	23	165	2	Non-responsive to designation; foundation; impermissible opinion testimony	142	8	142	19			

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78	24	79	11	Lack of personal knowledge; foundation		165	4	165	8	Non-responsive to designation; foundation; impermissible opinion testimony		149	13	149	15	Lack of personal knowledge; foundation	
												149	16	150	5	Lack of personal knowledge; foundation	
79	15	79	22														
79	23	81	19	Improper designation - designation begins mid-question; lack of personal knowledge; foundation													
83	3	83	15	Lack of personal knowledge; foundation													
84	7	84	11	Lack of personal knowledge; foundation													
87	12	87	25	Lack of personal knowledge; foundation													
92	11	94	13	Relevance													
94	21	96	5	Relevance													
96	14	97	23	Relevance; 96:14-96:16 Lack of personal knowledge, foundation; 97:13-97:23 Lack of personal knowledge, foundation													
98	6	101	3	Relevance; 100:14-100:19 Speculation													
101	11	102	19	Relevance													
103	4	105	13	103:10-103:15 Time wasting; 103:4-105:13 Relevance													
105	20	107	4	Relevance; 107:3-104:3 Needlessly cumulative													
107	16	114	3	Relevance; 110:1-110:4 Lack of personal knowledge, foundation; 110:16-111:1 Foundation, relevance, lack of personal knowledge													
114	14	117	5	Relevance; 115:11-115:15 Speculation, lack of personal knowledge foundation; 115:19-116:15 lack of personal knowledge, foundation; 116:23-117:5 lack of personal knowledge, foundation													

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118	5	120	16	Relevance; 118:5-118:19 Foundation, lack of personal knowledge												
120	23	121	18	Relevance												
122	16	127	25	Relevance; 124:23-125:11 Lack of personal knowledge, foundation												
128	9	129	1	Relevance												
129	6	129	14	Relevance												
129	23	131	10	Relevance; 131:3-131:10 Lack of personal knowledge, speculation												

Steven Zelac September 14, 2023 Deposition Designations																	
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15	22	22	13	21:11-21:17 Lack of personal knowledge; lack of foundation; argumentative		11	12	11	15								
23	8	26	9			56	25	57	16	Not responsive to the designation.							
26	19	30	15	29:19-29:25 Lack of personal knowledge; speculation		58	15	59	7	Not responsive to the designation.		58	8	59	15	Incomplete without 58:7	
31	14	34	19			59	16	59	24	Not responsive to the designation.		59	25	60	4		
37	15	38	13			60	5	62	20	Not responsive to the designation.		230	2	231	23		
42	24	44	17			62	25	63	10	Not responsive to the designation.							
45	14	47	21			63	14	64	21	Not responsive to the designation.							
49	4	50	1			82	9	82	11	Not responsive to the designation; Question with answer.							
53	11	54	8			83	20	85	1	Not responsive to the designation.							
54	23	54	24			104	24	105	6	Not responsive to the designation.							
55	22	56	6			249	14	250	5	Not responsive to the designation.							
66	12	67	12	67:11-67:12 Relevance/improper designation - no testimony designated relating to Exhibit 3		260	10	260	12	Not responsive to the designation.							
72	9	73	5			260	16	261	1	Not responsive to the designation.							
81	17	81	18	Relevance/improper designation - no testimony designated regarding Exhibit 8		261	4	264	3	Not responsive to the designation.							
85	8	88	1	Hearsay; lack of personal knowledge; speculation		264	4	265	13	Not responsive to the designation.							
96	18	97	23	97:2-97:23 Foundation; lack of personal knowledge; speculation		265	14	266	11	Not responsive to the designation.; lack of foundatin; improper expert testimony from a lay witness.		266	16	271	16		
99	24	100	9	Foundation; lack of personal knowledge; speculation													
114	20	114	21	Foundation; lack of personal knowledge as to Exhibit 9; no testimony designated as to Exhibit 10													
116	18	117	11	Foundation; lack of personal knowledge													
127	11	127	12	Relevance/improper designation - no testimony designated as to Exhibit 12; relevance as to Exhibit 11													

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131	16	135	7												
135	10	139	5	135:23-136:2 Foundation, relevance, lack of personal knowledge; 136:14-136:24 Relevance, wasting time											
157	9	157	14												
179	6	180	3	Foundation; lack of personal knowledge; speculation											
191	18	194	9	194:4-194:9 Relevance											
200	20	203	12	200:20-202:10 Foundation; lack of foundation; lack of personal knowledge											
226	22	227	9												
246	20	248	18												
250	15	250	24												

Sheryl Telford November 2, 2023 Chemours 30(b)(6) Deposition Designations														
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11	4	11	10			36	10	36	22	Non-responsive to designation				
17	7	17	19			46	4	46	17	Non-responsive to designation; outside scope of 30(b)(6)				
18	7	19	5			46	18	47	7	Non-responsive to designation; outside scope of 30(b)(6)				
20	11	22	2	20:11-20:18 Foundation		49	2	49	10	Non-responsive to designation				
22	7	22	19			85	20	86	2	Non-responsive to designation				
24	7	24	12			176	1	176	6	Non-responsive to designation				
30	2	30	13			210	23	211	4	Non-responsive to designation				
31	5	33	19	Cumulative		232	21	233	2	Non-responsive to designation; incomplete designation				
34	13	36	9	Cumulative		233	5	233	8	Non-responsive to designation; incomplete designation				
37	10	37	14	Cumulative		233	11	233	16	Non-responsive to designation				
37	18	39	7			250	4	250	7	Non-responsive to designation				
40	11	41	8	Cumulative		276	12	276	19	Non-responsive to designation; incomplete designation				
42	17	43	8	Cumulative		276	22	277	9	Non-responsive to designation; incomplete designation				
44	19	45	22	Cumulative		277	13	277	20	Non-responsive to designation	277	21	278	4
48	10	49	1	Cumulative		279	21	280	13	Non-responsive to designation; incomplete designation				
73	16	75	10			280	16	280	20	Non-responsive to designation; incomplete designation				
76	2	78	23			284	19	285	9	Non-responsive to designation; speculation				
81	2	84	15	Foundation; relevance - presentation about CRG process 10 years before Chemours spinoff not relevant to process at time of spinoff		286	6	286	12	Non-responsive to designation; incomplete designation				
87	15	87	19			286	15	286	19	Non-responsive to designation; incomplete designation				
104	16	108	22			291	10	291	10	Non-responsive to designation; incomplete designation				
109	8	112	1			291	14	292	9	Non-responsive designation; incomplete designation; outside scope of 30(b)(6)				

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112	19	116	13			318	13	319	23	Non-responsive to designation; outside scope of 30(b)(6)							
117	9	120	20			320	2	320	3	Non-responsive to designation; outside scope of 30(b)(6)							
121	3	123	22			326	22	327	2	Non-responsive to designation; incomplete designation; outside scope of 30(b)(6)							
124	22	127	5			327	5	327	9	Non-responsive to designation; incomplete designation; outside scope of 30(b)(6)							
128	18	131	13			370	2	370	9	Non-responsive to designation							
135	10	136	3			370	14	371	5	Non-responsive to designation; outside scope of 30(b)(6)							
157	11	157	20	Foundation; relevance - no questions asked about document		371	23	373	11	Non-responsive to designation; incomplete designation; outside scope of 30(b)(6)							
168	15	169	4	Cumulative		373	15	373	20	Non-responsive to designation; incomplete designation; outside scope of 30(b)(6)							
170	8	171	6			373	22	374	13	Non-responsive to designation; incomplete designation							
171	10	171	20			374	22	375	16	Non-responsive to designation; incomplete designation; outside scope of 30(b)(6)							
172	8	172	18			375	18	376	10	Non-responsive to designation; incomplete designation; outside scope of 30(b)(6)	376	12	377	3			
175	16	176	6			377	5	377	14	Non-responsive to designation; incomplete designation; outside scope of 30(b)(6)							
177	20	179	18			377	17	377	21	Non-responsive to designation; incomplete designation; outside scope of 30(b)(6)							
180	5	180	20			377	24	378	23	Non-responsive to designation; incomplete designation							
183	18	184	2			379	1	379	2	Non-responsive to designation; incomplete designation							

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184	9	186	18			383	22	384	19	Non-responsive to designation; outside scope of 30(b)(6)							
187	13	188	9			384	21	385	2	Non-responsive to designation; outside scope of 30(b)(6)	383	1	383	7			
188	15	189	22	189:19-189:22 Foundation		385	4	386	3	Non-responsive to designation; outside scope of 30(b)(6)	202	4	203	2	Foundation		
190	1	190	9	Foundation		387	2	387	10		242	2	242	23	Foundation		
192	18	192	24	Vague; improper designation		388	6	388	14	Non-responsive to designation; outside scope of 30(b)(6)							
193	4	197	13			388	16	389	4	Non-responsive to designation; incomplete designation; outside scope of 30(b)(6)							
197	19	201	7	Foundation; 198:24-199:2 Improper designation, outside scope of 30(b)(6)		389	5	389	21	Non-responsive to designation; incomplete designation; outside scope of 30(b)(6)							
201	21	202	3			390	7	390	12	Non-responsive to designation; incomplete designation; outside scope of 30(b)(6)							
203	3	205	7							Non-responsive to designation; outside scope of 30(b)(6)							
206	24	209	17														
211	5	216	15	214:14-215:15 Foundation													
216	21	217	15	Foundation													
220	4	223	10	221:6-223:10 Foundation													
224	6	224	16	Foundation													
226	2	228	2	Foundation													
228	23	232	4	Foundation													
233	17	234	14	Foundation													
234	20	235	24	Foundation													
236	12	236	23														
240	11	241	17														
243	13	244	16														
244	21	246	10														
249	19	249	23														
250	9	251	2														
251	17	259	5														
261	9	267	5														
274	3	275	21														

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281	20	282	20												
283	11	284	6												
287	17	288	22												
289	6	290	6												
290	24	291	9												
294	6	297	16	Relevance											
318	3	318	5	Foundation; outside scope of 30(b)(6)											
324	11	324	19	Foundation; outside scope of 30(b)(6)											
325	21	326	13	Foundation; outside scope of 30(b)(6)											
327	16	328	5	Foundation; outside scope of 30(b)(6)											
328	13	330	15	Foundation; outside scope of 30(b)(6)											
331	15	332	19												
333	1	333	12												
338	16	339	4												
341	21	341	24	Cumulative											
342	4	342	7	Cumulative											
344	15	345	1	Cumulative											

Linda West August 31, 2023 DuPont 30(b)(6) Deposition Designations																	
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11	14	11	16			15	16	15	20								
11	23	12	10			30	14	31	7	Hearsay; improper designation of 30(b)(6) testimony of own witness; Not responsive to the designation.							
13	21	13	23			32	24	33	5	Hearsay; improper designation of 30(b)(6) testimony of own witness; Not responsive to the designation.							
14	7	15	15			52	12	52	19	Hearsay; improper designation of 30(b)(6) testimony of own witness; Not responsive to the designation.							
18	2	18	18			55	3	55	14	Hearsay; improper designation of 30(b)(6) testimony of own witness; Not responsive to the designation.							
20	12	20	25	20:20-20:25 Relevance		58	19	59	17	Hearsay; improper designation of 30(b)(6) testimony of own witness; Not responsive to the designation.							
21	4	21	18			62	23	63	4	Hearsay; improper designation of 30(b)(6) testimony of own witness; Not responsive to the designation.							
22	1	22	25	22:10-22:17 Improper designation; foundation		64	2	65	5	Hearsay; improper designation of 30(b)(6) testimony of own witness; Not responsive to the designation.							
24	4	29	20	24:19-25:4 Foundation; 25:10-26:10 Foundation, beyond scope of 30(b)(6); 27:1-29:20 Foundation, relevance, beyond scope of 30(b)(6)		67	16	67	21	Hearsay; improper designation of 30(b)(6) testimony of own witness; Not responsive to the designation.							
30	5	30	9	Relevance; foundation; beyond scope of 30(b)(6)		70	2	71	10	Hearsay; improper designation of 30(b)(6) testimony of own witness; Not responsive to the designation.							
31	22	32	23	Relevance; foundation; beyond scope of 30(b)(6)		90	12	90	17	Hearsay; improper designation of 30(b)(6) testimony of own witness; Not responsive to the designation.							
33	6	34	18			90	20	90	25	Hearsay; improper designation of 30(b)(6) testimony of own witness; Not responsive to the designation.							
34	23	37	9			137	14	137	23	Hearsay; improper designation of 30(b)(6) testimony of own witness; Not responsive to the designation.							

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37	20	40	1			151	24	152	7	Hearsay; improper designation of 30(b)(6) testimony of own witness; Not responsive to the designation.				
42	9	42	24	Cumulative		173	19	173	24	Hearsay; improper designation of 30(b)(6) testimony of own witness; Not responsive to the designation.				
43	15	43	18			181	23	182	6	Hearsay; improper designation of 30(b)(6) testimony of own witness; Not responsive to the designation.				
46	17	47	5			182	9	182	21	Hearsay; improper designation of 30(b)(6) testimony of own witness; Not responsive to the designation.				
49	11	50	6			182	24	183	3	Hearsay; improper designation of 30(b)(6) testimony of own witness; Not responsive to the designation.				
57	23	58	2	Foundation		223	12	224	2	Hearsay; improper designation of 30(b)(6) testimony of own witness.				
59	18	60	3	Relevance; speculation		224	5	224	11	Hearsay; improper designation of 30(b)(6) testimony of own witness.				
60	13	60	18	Relevance		224	14	224	17	Hearsay; improper designation of 30(b)(6) testimony of own witness.				
61	10	61	13											
62	4	62	13											
63	9	63	21											
65	6	65	16											
66	22	67	15											
68	3	70	1	68:9-69:9 Legal conclusion; foundation										
71	11	72	12											
73	19	75	12											
76	6	79	23											
80	10	82	19	80:10-81:7 Foundation; speculation										
83	1	83	17	83:1-83:8 Foundation; speculation										
83	24	84	9											
88	15	90	2											
94	20	95	24											
96	16	97	3											

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103	3	104	19														
105	10	107	12	Relevance; unfair prejudice													
108	20	109	18														
110	3	110	21														
111	15	112	2	Foundation													
119	12	120	15	119:13-120:15 Hearsay; foundation; speculation													
132	3	132	7	Foundation; speculation													
132	10	132	13														
133	18	135	16														
138	2	138	18														
140	24	141	4														
144	7	146	7														
153	16	153	25														
155	18	157	2														
164	23	165	16														
168	12	169	3	Foundation; speculation													
170	25	173	18														
176	25	181	9	176:25-179:21 Hearsay, foundation; 179:23-181:9 Foundation, speculation													
184	18	185	7	185:1-185:7 Foundation; speculation													
186	8	186	24	186:9-186:24 Foundation; cumulative of other 30(b)(6) testimony													
202	1	202	18														
229	6	229	19	Hearsay; foundation													

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14	2	14	3			45	24	46	2	Non-responsive to designation; incomplete designation							
15	20	16	2			46	4	46	7	Non-responsive to designation; incomplete designation; foundation	46	9	46	21			
											47	16	48	2			
16	7	16	10			48	3	48	5	Non-responsive to designation; incomplete designation; outside scope of 30(b)(6)							
17	17	19	20			48	7	48	10	Non-responsive to designation; incomplete designation; outside scope of 30(b)(6)							
21	5	21	20			53	10	53	14	Non-responsive to designation							
24	10	25	8			57	12	57	14	Non-responsive to designation; outside scope of 30(b)(6)							
31	10	32	1			67	24	68	1	Non-responsive to designation; incomplete designation							
32	14	32	25			71	25	72	2	Non-responsive to designation; incomplete designation							
33	9	34	25			72	4	72	12	Non-responsive to designation; incomplete designation	72	13	72	24			
35	10	36	4			78	2	80	7	Non-responsive to designation; foundation; hearsay							
39	9	39	21			115	23	115	25	Non-responsive to designation							
41	13	42	20			126	2	126	21	Non-responsive to designation; outside scope of 30(b)(6); foundation							
44	19	45	23	45:9-45:15 Foundation		126	23	127	7	Non-responsive to designation; outside scope of 30(b)(6); foundation	128	5	128	15			
46	23	47	5			127	9	127	16	Non-responsive to designation	128	5	128	15			
47	16	48	2			156	17	157	22	Non-responsive to designation; outside scope of 30(b)(6)							
49	8	49	12			159	10	160	5	Non-responsive to designation							
50	10	51	10	50:15-51:10 Relevance; not 30b6 on this issue		160	7	160	24	Non-responsive to designation; foundation							

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55	14	55	17			199	12	200	2	Non-responsive to designation; outside scope of 30(b)(6)							
55	23	56	20	55:24-56:20 Foundation		200	3	200	22	Non-responsive to designation; outside scope of 30(b)(6)							
57	2	57	10	Foundation; relevance		201	1	201	4	Non-responsive to designation; outside scope of 30(b)(6)							
57	15	57	19	Foundation; relevance		241	25	243	9	Non-responsive to designation; outside scope of 30(b)(6); foundation; hearsay							
59	10	59	22	Relevance; foundation; outside scope of 30(b)(6)		243	11	244	8	Non-responsive to designation; incomplete designation; outside scope of 30(b)(6); foundation; hearsay							
60	2	60	12			244	10	245	9	Non-responsive to designation; incomplete designation; outside scope of 30(b)(6); foundation; hearsay							
61	3	66	15	66:1-66:8 Foundation		245	11	246	8	Non-responsive to designation; incomplete designation; foundation							
67	24	71	21	69:10-69:23 Foundation; asks for legal conclusion		246	10	247	2	Non-responsive to designation; incomplete designation							
72	25	77	25	76:17-77:1 Foundation; 76:4-76:8 Relevance		247	9	248	3	Non-responsive to designation; incomplete designation							
80	8	81	9	81:2-81:9 Relevance; foundation; outside scope of 30(b)(6)		248	6	249	22	Non-responsive to designation; incomplete designation; outside scope of 30(b)(6); hearsay							
82	5	84	12	83:1-83:21 Foundation		249	24	250	4	Non-responsive to designation; incomplete designation; outside scope of 30(b)(6); hearsay							
85	8	86	3			250	18	251	21	Non-responsive to designation; incomplete designation; outside scope of 30(b)(6); hearsay		253	15	254	11	Objection to inclusion of attorney objection and co	
90	1	90	8			251	24	252	25	Non-responsive to designation; incomplete designation; outside scope of 30(b)(6); hearsay		253	15	254	11	Objection to inclusion of attorney objection and co	

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91	9	91	12			254	15	254	18	Non-responsive to designation; incomplete designation; outside scope of 30(b)(6)		254	19	254	20	Objection to inclusion of attorney objection and co	
107	20	110	17			254	21	255	6	Non-responsive to designation; incomplete designation; outside scope of 30(b)(6)		254	19	254	20	Objection to inclusion of attorney objection and co	
112	21	115	22	113:5-113:11 Foundation		255	8	255	16	Non-responsive to designation; incomplete designation; outside scope of 30(b)(6)							
116	1	122	2	118:25-119:18 Foundation		255	18	255	23	Non-responsive to designation; incomplete designation; outside scope of 30(b)(6)							
122	22	125	25	122:22-123:5 Relevance		257	2	258	7	Non-responsive to designation							
128	16	128	18			258	12	260	2	Non-responsive to designation; outside scope of 30(b)(6); hearsay							
129	10	130	14			260	10	261	13	Non-responsive to designation; outside scope of 30(b)(6); hearsay							
133	23	134	25	134:16-134:21 Relevance		261	18	265	11	Non-responsive to designation; outside scope of 30(b)(6)							
137	18	138	5			265	14	270	6	Non-responsive to designation; incomplete designation; outside scope of 30(b)(6); hearsay							
140	2	140	7			270	8	270	9	Non-responsive to designation; incomplete designation; outside scope of 30(b)(6)							
142	18	145	8	143:14-144:1 Relevance; 144:2-145:8 Foundation		270	12	270	15	Non-responsive to designation; incomplete designation; outside scope of 30(b)(6); impermissible opinion testimony							
145	24	148	2	145:24-146:3 Relevance; 146:24-147:6 Foundation		270	17	270	21	Non-responsive to designation; incomplete designation; outside scope of 30(b)(6); impermissible opinion testimony		276	25	278	15	Relevance; more prejudicial than probative; scope; foundation	

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158	17	159	9			271	6	271	7	Non-responsive to designation; incomplete designation; outside scope of 30(b)(6); impermissible opinion testimony		276	25	278	15	Relevance; more prejudicial than probative; scope; foundation	
162	11	164	24			271	9	271	12	Non-responsive to designation; incomplete designation; outside scope of 30(b)(6); impermissible opinion testimony							
165	18	166	25	165:20-165:24 Relevance		271	14	271	14	Non-responsive to designation; incomplete designation; outside scope of 30(b)(6); impermissible opinion testimony							
167	13	167	22			271	16	271	19	Non-responsive to designation; incomplete designation; outside scope of 30(b)(6)							
169	19	171	16			271	21	272	2	Non-responsive to designation; incomplete designation; outside scope of 30(b)(6)							
173	19	173	23			272	6	272	8	Non-responsive to designation; incomplete designation; outside scope of 30(b)(6)							
174	1	174	10			272	10	272	10	Non-responsive to designation; incomplete designation; outside scope of 30(b)(6)							
178	16	182	22														
183	1	183	11														
186	19	187	7														
188	6	189	12	188:6-188:10 Relevance, cumulative; 188:11-189:12 Foundation													
190	23	191	23														
194	19	196	11														
197	8	199	11														
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276	25	278	15	277:4-278:15 Relevance; more prejudicial than probative; outside scope of 30(b)(6); foundation										

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12	14	12	16			24	3	24	7	Hearsay; improper designation of 30(b)(6) testimony of own witness; Not responsive to the designation.		24	8	25	10	24:9-16 Foundation; 24:12, 24:20-24, 25:7 Improper Designations	
13	2	13	13			82	15	82	20	Hearsay; improper designation of 30(b)(6) testimony of own witness; Not responsive to the designation.							
14	23	15	15			125	22	125	24	Not responsive to the designation.							
18	3	19	25			126	2	126	7	Not responsive to the designation.							
20	17	20	22	20:18-20:22 Vague; relevance; foundation; improper opinion testimony		138	6	138	10	Hearsay; improper designation of 30(b)(6) testimony of own witness; Not responsive to the designation.							
21	9	23	5	21:10-21:17 Vague; compound; foundation		143	13	143	20	Hearsay; improper designation of 30(b)(6) testimony of own witness; Not responsive to the designation.							
25	11	26	16			171	3	171	10	Not responsive to the designation.							
26	24	27	7	27:1-27:7 Relevance		171	13	171	14	Not responsive to the designation.							
28	2	28	19	28:2-28:17 Hearsay, foundation; 28:19-28:19 Hearsay, foundation, outside scope of 30(b)(6)		268	8	268	15	Hearsay; improper designation of 30(b)(6) testimony of own witness; Not responsive to the designation.							
29	14	30	17	29:14-29:19 Hearsay, foundation; outside scope of 30(b)(6); 29:21-30:17 Foundation, lack of personal knowledge, vague		268	16	269	1	Hearsay; improper designation of 30(b)(6) testimony of own witness; Not responsive to the designation.							
37	6	39	2	37:6-37:12 Relevance; 37:13-37:19 Vague, argumentative, compound, foundation; 38:3-39:2 Hearsay, foundation, lack of personal knowledge, vague		269	2	269	11	Hearsay; improper designation of 30(b)(6) testimony of own witness; Not responsive to the designation.							
41	15	42	6	41:20-42:6 Hearsay; foundation		269	12	269	15	Hearsay; improper designation of 30(b)(6) testimony of own witness; Not responsive to the designation.							
42	22	44	9	42:22-43:4 Relevance; 43:5-44:9 Hearsay, foundation, lack of personal knowledge, vague, argumentative		269	18	270	9	Hearsay; improper designation of 30(b)(6) testimony of own witness; Not responsive to the designation.							
44	22	44	24	Hearsay; foundation; lack of personal knowledge; vague; argumentative		270	12	270	25	Hearsay; improper designation of 30(b)(6) testimony of own witness; Not responsive to the designation.							

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58	23	59	19	58:23-59:14 Relevance; 59:15-59:19 Hearsay, foundation, lack of personal knowledge, calls for speculation, vague, argumentative		271	12	273	2	Hearsay; improper designation of 30(b)(6) testimony of own witness; Not responsive to the designation.							
65	10	66	11	65:13-65:20 Relevance; 65:21-56:22 Hearsay, foundation		274	11	274	13	Hearsay; improper designation of 30(b)(6) testimony of own witness; Not responsive to the designation.							
69	9	73	20	69:10-69:15 Foundation; 70:14-70:18; Hearsay, foundation; 70:9-70:13 Hearsay, foundation; 71:15-73:6 Hearsay, foundation, outside scope of 30(b)(6); 73:12-73:20 Hearsay, foundation		274	17	275	1	Hearsay; improper designation of 30(b)(6) testimony of own witness; Not responsive to the designation; lack of personal knowledge; calls for speculation.							
74	21	78	3	Hearsay, foundation; 75:25-76:11 Hearsay, foundation, lack of personal knowledge, calls for speculation, vague, argumentative; 75:9-75:24 Hearsay, foundation; 77:20-78:3 Foundation		275	4	275	12	Hearsay; improper designation of 30(b)(6) testimony of own witness; Not responsive to the designation; lack of personal knowledge; calls for speculation.							
78	20	79	4			276	9	277	24	Hearsay; improper designation of 30(b)(6) testimony of own witness; Not responsive to the designation; lack of personal knowledge.							
85	9	85	15			281	5	284	3	Hearsay; improper designation of 30(b)(6) testimony of own witness; Not responsive to the designation; lack of personal knowledge; calls for speculation; outside the scope of 30(b)(6) topics.							
86	7	86	14	86:7-86:10 Foundation; 86:11-86:14 Foundation		284	4	285	4	Hearsay; improper designation of 30(b)(6) testimony of own witness; Not responsive to the designation; relevance.							

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87	16	87	22	Hearsay; foundation		285	15	285	15	Hearsay; improper designation of 30(b)(6) testimony of own witness; Not responsive to the designation; relevance.							
88	5	88	12	Hearsay; foundation		286	4	286	5	Hearsay; improper designation of 30(b)(6) testimony of own witness; Not responsive to the designation; lack of foundation; purported expert testimony from a lay witness.							
90	22	92	7	90:23-91:10 Hearsay, foundation; 91:11-92:1 Hearsay, foundation; 92:3-92:7 Hearsay, foundation, vague, argumentative		286	8	286	10	Hearsay; improper designation of 30(b)(6) testimony of own witness; Not responsive to the designation; lack of foundation; purported expert testimony from a lay witness.	286	23	288	11			
93	18	93	25	Hearsay; foundation		286	12	286	15	Hearsay; improper designation of 30(b)(6) testimony of own witness; Not responsive to the designation; lack of foundation; purported expert testimony from a lay witness.							
98	1	99	16	98:19-99:6 Foundation; 99:7-99:16 Hearsay, foundation		286	17	286	17	Hearsay; improper designation of 30(b)(6) testimony of own witness; Not responsive to the designation; lack of foundation; purported expert testimony from a lay witness.							
100	11	100	20	Hearsay; foundation; lack of personal knowledge; vague													
101	4	101	19	Hearsay; foundation; outside the scope													
102	4	104	10	102:4-102:17 Foundation, outside the scope; 103:13-104:10 Foundation, lack of personal knowledge, vague, argumentative, outside scope of 30(b)(6)													

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115	9	115	21	115:9-115:18 Hearsay; foundation									
116	11	116	23	116:12-116:23 Hearsay; foundation; lack of personal knowledge; calls for speculation; vague; argumentative									
117	8	117	21	Foundation									
125	1	125	21										
132	11	133	12	133:10-133:12 Foundation									
133	21	134	24	133:21-134:2 Hearsay, foundation; 134:16-134:23 Hearsay, foundation, lack of personal knowledge									
136	20	137	7	Hearsay; foundation; lack of personal knowledge; calls for speculation; vague; argumentative; calls for opinion testimony									
138	11	138	14										
139	10	139	14										
156	4	156	18	156:8-156:18 Hearsay; foundation									
157	4	158	6	157:4-157:8 Hearsay, foundation; 157:10-158:6 Hearsay, foundation, vague, argumentative									
161	23	161	25										
162	8	162	19	162:9-162:16 Hearsay; foundation; vague									
163	10	163	19	Foundation; vague									
170	4	171	2	Hearsay; foundation									

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175	11	177	12	175:19-176:2 Foundation, vague, lack of personal knowledge; 176:13-176:19 Foundation, lack of personal knowledge, vague; 176:21-177:3 Hearsay, foundation; 176:3-176:7 Foundation, vague, lack of personal knowledge; 176:9-176:12 Foundation; 177:4-177:12 Hearsay, foundation, lack of personal knowledge, argumentative													
178	21	180	2	179:2-179:5 Foundation; 179:6-180:2 Hearsay, foundation													
180	22	182	24														
183	19	184	9														
185	7	188	11														
188	24	190	16	190:9-190:16 Foundation; hearsay; argumentative; lack of personal knowledge													
191	23	193	3														
193	10	193	23														
194	18	196	7	196:1-196:7 Foundation; vague; argumentative													
196	16	197	20	197:3-197:20 Hearsay; foundation													
197	24	198	15	197:24-197:25 Hearsay, foundation; 198:7-198:15 Hearsay, foundation, vague, argumentative													
199	9	200	18	199:21-199:25 Foundation, lack of personal knowledge; 200:9-200:18 Foundation, lack of personal knowledge, vague													
204	5	205	25	204:6-204:12 Hearsay, Foundation; 204:13-204:18 Foundation													

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212	15	212	25	Hearsay; foundation													
215	8	215	22	Hearsay; foundation; lack of personal knowledge; vague; argumentative; calls for opinion													
222	2	222	3														
222	10	224	8	223:1-223:10 Hearsay, foundation; 223:17-224:8 Hearsay, foundation													
238	5	242	12	238:6-238:12 Foundation, lack of personal knowledge; 238:14-239:3 Foundation, lack of personal knowledge, vague; 239:5-241:1 Foundation, calls for speculation; 241:10-241:20 Foundation; 241:22-242:12 Foundation; 241:3-241:9 Foundation													

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6	20	6	22			49	15	49	17	Not responsive to the designation.							
12	11	13	23			49	19	49	24	Not responsive to the designation.							
14	2	15	3			62	15	62	17	Not responsive to the designation.							
15	21	16	6			62	20	62	25	Not responsive to the designation.							
17	15	18	23			99	4	99	9	Not responsive to the designation; speculation; no personal knowledge	99	15	99	25			
20	19	22	16			110	17	111	3	Not responsive to the designation; speculation; no personal knowledge							
23	9	23	25														
25	15	27	14														
28	25	31	15														
32	2	37	22														
38	25	39	15														
42	8	49	13														
51	20	53	12														
56	24	57	18														
60	4	62	13														
63	1	63	4														
66	8	70	13	67:11-68:7 Foundation; 67:6-67:10 Foundation; 68:8-69:2 Foundation, calls for speculation; 69:9-69:19 Foundation, calls for speculation, lack of personal knowledge													
72	14	73	3														
73	19	75	18	74:6-74:11 Foundation; 74:19-75:18 Foundation, vague													
76	24	78	19														
79	10	79	25														
80	13	81	20														
82	21	83	21														
85	3	88	20														
92	3	92	21														
93	17	94	16														
94	25	95	6														
97	5	99	3	98:16-99:3 Misrepresents the document													
100	1	100	16	100:10-100:16 Misrepresents the document													

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				104:17-104:20 Foundation; 104:21-105:2 Foundation, mischaracterizes the documents; 104:7-104:10 Foundation; 105:18-105:25 Foundation; 106:14-106:24 Foundation, vague; 108:13-108:17 Foundation, vague; 108:18-108:25 Calls for speculation, mischaracterizes testimony; 109:20-109:25 Foundation, vague										
103	14	109	25											
110	5	110	16											
113	12	114	6	Foundation; calls for speculation										
118	13	119	9	Foundation; calls for speculation										
139	5	139	14											
182	12	183	10	182:18-182:21 Foundation; 183:1-183:6 Foundation, vague; 183:8-183:10 Foundation										

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15	5	15	16			70	2	70	6	Not responsive to the designation.							
16	21	23	1			70	9	70	15	Not responsive to the designation.							
25	10	26	8			115	1	115	21	Not responsive to the designation.							
28	21	29	5			115	22	118	16	Not responsive to the designation.	118	17	119	9			
29	20	33	4	30:5-30:14 Relevance		147	23	148	4	Not responsive to the designation.							
33	25	34	19			148	6	148	17	Not responsive to the designation.	148	18	149	11	149:7 Improper designation		
35	8	37	3			161	21	162	9	Not responsive to the designation.	162	11	162	18			
40	4	43	7			187	8	187	10	Not responsive to the designation.							
45	23	56	8	51:23-52:23 Relevance; improper designation		187	12	187	19	Not responsive to the designation.							
57	5	58	25			187	21	188	13	Not responsive to the designation.	188	15	189	8	188:23 Improper designation		
61	2	62	13			204	4	204	6	Not responsive to the designation.							
63	24	66	19			204	8	204	10	Not responsive to the designation.	204	12	205	5			
66	22	67	10			235	16	236	9	Not responsive to the designation.							
68	16	70	1														
70	23	72	5														
76	6	78	11														
79	9	80	20														
83	7	89	13														
90	15	92	19														
92	25	95	12														
100	17	100	24														
101	16	103	25														
106	19	107	14														
109	1	109	24														
110	6	112	19														
113	10	114	25														
120	24	126	7	120:24-121:2 Relevance; assumes facts not in evidence; foundation													
129	12	130	14														
133	14	135	7	134:20-135:7 Foundation; 134:3-134:19 Foundation													
138	15	138	23	Foundation, cumulative													
139	1	139	17	Foundation													
140	1	147	8	140:1-140:13 Foundation, relevance; 141:9-141:24 Foundation; 144:19-145:4 Foundation													

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154	18	155	10	154:18-155:1 Hearsay													
156	4	156	11	Hearsay, Foundation													
156	22	157	9	156:23-157:9 Hearsay													
157	23	158	9														
158	23	161	19														
169	25	174	12														
177	4	178	1														
179	11	179	18														
181	24	185	10	183:16-183:20 Cut commentary													
186	3	187	6														
189	10	191	8	190:9-190:18 Relevance; assumes facts not in evidence, foundation													
193	2	194	25														
196	1	196	25														
198	21	204	3														
209	2	210	4														
211	12	212	21														
214	18	223	6	216:24-217:9 Foundation; 219:25-223:6 Foundation													
224	7	225	8	224:21-225:8 Relevance; foundation													
226	10	228	3	226:25-228:3 Foundation; hearsay													
229	10	234	5	233:5-233:16 Asked and answered; cumulative													
234	17	235	14	231:14-233:2 Hearsay; foundation													
236	17	240	10	Relevance; foundation													